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December 14, 2020

Deana Williamson, Clerk
Court of Criminal Appeals of Texas
via e-file

FILED
COURT OF CRIMINAL APPEALS
12/15/2020
DEANA WILLIAMSON, CLERK

Re: *Ex parte Joseph Gomez*
Case Nos. PD-0724-20 and PD-0725-20
Second Letter of Supplemental Authority

Dear Ms. Williamson:

Prior to this case being submitted to the Court, myself and co-counsel would like to submit the following supplemental authority to the Court for consideration of the issue designated for review.

Mr. Gomez would direct the Court to its decision in *Ex parte Williams*, 619 S.W.2d 180, 182 (Tex. Crim. App. 1981) where the Court held that, “in the absence of an order revoking an otherwise valid personal bond taken for release of one charged by complaint and ordering the rearrest of the accused after return of an indictment, in twin compliance with Article 17.031(a) and Article 17.09, § 3, [an] accused is entitled to remain at liberty under the bond entered into before the magistrate.” We believe this decision supports the Court of Appeals’ decision in this case finding that the trial court erred in revoking Mr. Gomez’s bonds under Article 17.09, Section 3 and that, by considering another similar statute, namely, Article 17.031(a), Texas Code of Criminal Procedure, good cause is required to revoke a valid bond.

We appreciate your attention to the matter.

Respectfully Submitted,

/s/ T. Brent Mayr
T. Brent Mayr
Attorney for Applicant, Joseph Gomez

cc: Clint Morgan, attorney for the State
& State Prosecuting Attorney Stacey Soule
via service through counsel’s electronic filing manager on
December 14, 2020

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